

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DAILY NEWS, LP; CHICAGO TRIBUNE COMPANY, LLC; ORLANDO SENTINEL COMMUNICATIONS COMPANY, LLC; SUN-SENTINEL COMPANY, LLC; SAN JOSE MERCURY-NEWS, LLC; DP MEDIA NETWORK, LLC; ORB PUBLISHING, LLC; AND NORTHWEST PUBLICATIONS, LLC,

Plaintiffs.

V.

MICROSOFT CORPORATION; OPENAI, INC.; OPENAI LP; OPENAI GP, LLC; OPENAI, LLC; OPENAI OPCO, LLC; OPENAI GLOBAL, LLC; OAI CORPORATION, LLC; and OPENAI HOLDINGS, LLC,

Defendants.

Case No. 1:24-cv-03285-SHS

**AFFIDAVIT OF LAURA NAJEMY IN SUPPORT OF
MOTION TO ADMIT COUNSEL *PRO HAC VICE***

COUNTY OF SUFFOLK)
):ss
COMMONWEALTH OF MASSACHUSETTS)

Laura Najemy, being duly sworn, deposes and says as follows:

1. I am a Partner with the law firm of Orrick, Herrington & Sutcliffe LLP.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above captioned action.

3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the Commonwealth of Massachusetts.

4. There are no pending disciplinary proceedings against me in any State or Federal court.

5. I have not been convicted of a felony.
6. I have not been censured, suspended, disbarred or denied admission or readmission by any court.

7. Wherefore I, Laura Najemy, respectfully submit that I be permitted to appear as counsel and advocate *pro hac vice* in this action for Defendant Microsoft Corporation.



Laura Najemy

Sworn to before me
this 22 day of May, 2024



Lynne P. Sollis
Notary Public

